

Law Offices of Michael V. Calabro
(001201986)
475 Bloomfield Ave.
Newark, New Jersey 07107
Attorney for Defendant, Kevin Jackson

United States of America

Plaintiff,

vs.

Kevin Jackson,

Defendant,

: **UNITED STATES DISTRICT COURT**
: **DISTRICT OF NEW JERSEY**

:

: Docket No.:21-10198

:

:
: *CRIMINAL ACTION*

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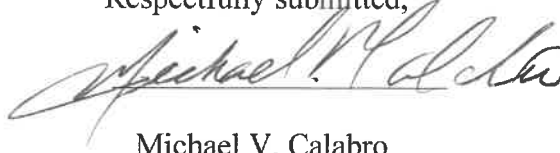
NOTICE OF MOTION TO REVOKE
PRETRIAL DETENTION ORDER A
AND ADMIT DEFENDANT TO BAIL

:

PLEASE TAKE NOTICE that at a time and date to be set by the court, at the United States Courthouse, Newark, New Jersey, the Defendant, Kevin Jackson, by and through counsel, respectfully moves this court pursuant to **18 U.S.C. § 3145(b)**, to revoke the Order of Detention entered in this case on May 25, 2021 and instead to Order that Kevin Jackson be released pending trial under conditions and under the monitoring of United States Pre-Trial Services. In support of this Motion I have attached a Certification with exhibits. A form of Order is also provided.

WHEREFORE, defendant respectfully requests that the Order of pre-trial detention be revoked and that the defendant be released under conditions and monitoring of United States Pretrial Services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael V. Calabro", written over a horizontal line.

Michael V. Calabro

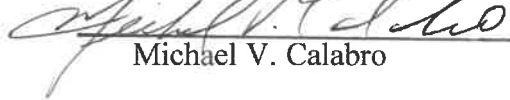
Counsel for Defendant

CERTIFICATION OF SERVICE

I certify that a true and accurate copy of the foregoing Motion to Revoke the Order of Detention and Certification was served upon Dong Joo Lee, Assistant United States Attorney by submission on the docket.

Dated: June 27, 2022

Law Offices of Michael V. Calabro

A handwritten signature in black ink, appearing to read "Michael V. Calabro", is written over a horizontal line.

Michael V. Calabro

Attorney for Defendant